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## McDermott, Will & Emery

September 5, 2002

## VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Thomas Krueger, Esq.
Associate Regional Counsel
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

EPA Region 5 Records Ctr.

Re: Rexnord Corporation

Response to General Notice Letter for the Ellsworth Industrial Park Site

Dear Mr. Krueger:

We are responding on behalf of Rexnord Corporation ("Rexnord") to the United States Environmental Protection Agency's ("EPA") August 1, 2002 General Notice Letter ("Notice Letter") regarding the Ellsworth Industrial Park Site in Downers Grove, Illinois ("Site"). This response is made without any acknowledgement that Rexnord is a "responsible party" under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9601 et seq., without any admission of liability or responsibility under CERCLA or any other statute, without acknowledgment of the applicability of the authorities referenced in the Notice Letter, and without waiver of any applicable defenses.

We understand that the Notice Letter was directed to numerous companies that are currently located in or have been, at one time, located in the Ellsworth Industrial Park. Rexnord is reviewing the information recently made available to it by EPA at the August 20, 2002 meeting.

The Notice Letter requests that Rexnord and the other recipients agree to perform and/or finance a Remedial Investigation ("RI") and Feasibility Study ("FS") at the Site. The Notice Letter also includes an offer to participate in settlement discussions with potentially responsible parties and encourages the parties receiving the Notice Letter to negotiate among themselves regarding the preparation of an RI/FS for the Site. While its investigation of this matter is continuing, Rexnord is willing to participate in discussions with EPA and the other responsible parties concerning the Site and the future performance of an RI/FS.

Thomas Krueger, Esq. Associate Regional Counsel United States Environmental Protection Agency September 5, 2002 Page 2

If you have any questions regarding this letter, please contact me. I look forward to hearing from you.

Very truly yours,

Todd R. Wiener

TRW/mb

cc: All PRPs to Whom General Notice Letter Was Sent (via U.S. Mail)